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7 ANNA GATTI and IQ SYSTEMS, LLC

8
9 UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 LOOP AI LABS, INC., a Delaware
12 Corporation,

13 Plaintiff,

14 vs.

15 ANNA GATTI, et al.,

16 Defendants.

Case No. 3:15-CV-00798-HSG

**NOTICE OF MOTION OF
DEFENDANTS' PARTIAL MOTION TO
DISMISS (F.R.C.P. 12(b)(6)) AND, IN THE
ALTERNATIVE, MOTION TO STRIKE
(F.R.C.P. 12(f)(2))**

Date: April 23, 2015
Time: 2:00 p.m.
Judge: Hon. Haywood S. Gilliam Jr.
Location: San Francisco Courthouse,
Courtroom 15—18th Floor
450 Golden Gate Avenue,
San Francisco, CA 94102

21 PLEASE TAKE NOTICE that, pursuant to Rule 12(b)(6) and 12(f)(2) of the Federal Rules of
22 Civil Procedure and Civil Local Rules 7-1 and 7-2, on April 23, 2015 at 2:00 p.m. or as soon thereafter
23 as this matter may be heard, Defendants ANNA GATTI and IQ SYSTEMS, LLC will and hereby do
24 move this Court to dismiss 8 of the 14 causes of action in Plaintiff LOOP AI LABS, INC.'s complaint
25 for failure to state a claim and, in the alternative, to strike portions thereof. This motion is based on this
26 Notice, the Memorandum of Points and Authorities, the Declaration of Koray Bulut, and the Exhibit A
27 attached thereto, and the Proposed Order filed with this Notice.

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1 Defendants seek an order dismissing 8 of Plaintiff's causes of action because they do not exist
2 under California law and would be preempted by the Uniform Trade Secrets Act if they did exist, and
3 one cause of action because Plaintiff did not allege facts sufficient to state a claim.

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5 Dated: March 16, 2015

6 LOW, BALL & LYNCH

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8 By /s/ Thomas J. LoSavio
9 THOMAS J. LOSAVIO
10 JAMES F. REGAN
11 Attorneys for Defendants
12 ANNA GATTI and IQ SYSTEMS, LLC
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